

# Exhibit A

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA, et al.,

v.  
Plaintiffs,

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**[PROPOSED] ORDER**

PURSUANT TO Local Civil Rule 5, Plaintiffs and Defendant Google LLC (“Google”) have filed proposed trial exhibit lists (“Lists”) and non-party PubMatic, Inc. (“PubMatic”) has filed an Objection to the Public Use at Trial of Confidential PubMatic Board Presentation and Data (“Objection”).

Upon consideration of the Lists, Objection, and response(s) thereto (if any):

- (i) sufficient notice has been given (Dkt. Nos. 871, 913);
- (ii) the following pages of proposed trial exhibit DTX 665 contain PubMatic’s confidential business information and/or trade secrets (“Sensitive Pages”): pages 21, 23, 27–28, 32, 35–36, 42, 45–49, 53–54, 57–58, 74, and 78–81 (PUBMATIC\_DOJ-00000134, 136, 140–41, 145, 148–49, 155, 158–62, 166–67, 170–71, 187, and 191–94);
- (iii) the following proposed trial exhibits have been identified by the parties as containing PubMatic’s information or data (the “Sensitive Exhibits”): PTX 1199, 1200, 1202, 1203, 1205, 1213, 1233, 1237, 1238, 1239, 1240, 1241, 1260, 1261, 1262, 1263, 1265, 1266, 1280, 1292, 1293, 1294, 1295, 1306, 1307, 1310, 1311, 1314, 1317, 1318, 1364, 1365, 1396, and 1397; and DTX 1651, 1839, 1862, 1891, 1892, 1893, 1943, 1948, 1949, 1950, 1955, 1956, 1959, 1989,

1991, 2043, 2044, 2045, 2046, 2047, 2048, 2051, 2053, 2054, 2056, 2057, 2058, 2064, 2065,  
2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, and 2076;

(iii) only sealing from public view the Sensitive Pages and those portions of the Sensitive Exhibits that identify PubMatic's data and information specifically will sufficiently protect PubMatic from competitive harm;

(iv) the limited sealing and redaction properly balances PubMatic's interests as against the public's interest; and

(v) any potential public right of access, whether based on the common law right of access, or the First Amendment right of access, has been overcome; and it is hereby

ORDERED that the Objection is SUSTAINED, as set forth above, and the parties shall not publicly disclose (in court or on the docket) the Sensitive Pages or those portions of the Sensitive Exhibits that identify PubMatic's data and information specifically.

ENTERED this \_\_\_\_\_ day of \_\_\_\_\_ 2024.

Alexandria, Virginia